



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

March 23, 2021

BY ECF

The Honorable Lewis J. Liman
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Cuong Bang, 19 Cr. 213 (LJL)*

Dear Judge Liman:

The parties in the above-captioned case write jointly to request an adjournment of the trial and associated pretrial submissions deadlines currently set in the above-captioned case.

The parties are currently engaged in plea discussions. In order to ensure that defense counsel has sufficient time to consult with her client (who is located in California) in person, including during a safety-valve proffer, and in light of the continued challenges associated with travel due to the COVID-19 pandemic, the parties respectfully request additional time to complete the process of resolving the case short of trial. The parties anticipate reaching a potential resolution in approximately four weeks, but in the event that more time is required due to current conditions, and in order to preserve the Court's, the public's, and other resources – particularly at a time when they are in short supply – the parties respectfully request that the current deadlines and trial date be adjourned *sine die*, with a conference to be scheduled at the Court's convenience in early May, should the parties not have arrived at a resolution before then.

The parties further request, pursuant to 18 U.S.C. § 3161(h)(7)(A), that time be excluded in the interest of justice between today and the rescheduled conference date, in order for the parties to

continue engaging in discussions regarding a resolution short of trial.

Respectfully submitted,

AUDREY STRAUSS
United States Attorney

By: s/ Elizabeth Hanft

Elizabeth A. Hanft
Assistant United States Attorney
(212) 637-2334

cc: Sabrina Shroff, Esq. (by ECF)

REQUEST GRANTED.

The current pretrial submissions deadlines and trial date are adjourned sine die. A Status Conference is scheduled for May 14, 2021 at 3:00PM by zoom video conference. The Court, with consent of all parties, excludes time from March 24, 2021 until May 14, 2021 under the Speedy Trial Act, 18 U.S.C. 3161(h)(7)(A), upon a finding that the interests of justice outweigh the interests of the public and the defendant in a speedy trial, in that the time between now and May 14 can be used by parties to continue engaging in discussions regarding a resolution short of trial.

3/24/2021 SO ORDERED.



LEWIS J. LIMAN
United States District Judge